November 20, 2019

LEWIS ⬛ JOHS
Lewis Johs Avallone Aviles, LLP

Counsellors at Law

Via ECF
The Hon. Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

> Re: **Jazmine Headley, on her own and on behalf of her minor infant son, D.B.**
> **v. City of New York, et al.**
> **Civil Action No. 1:19-CV-04543 (ENV)(RLM)**
> **LJAA File No.: 322-1044**

Your Honor:

This office represents the defendant, FJC SECURITY SERVICES ("FJC"), in the above-referenced matter. We also represent the defendant, "FJC SECURITY OFFICER CAPUSINE DELACRUZ". As the remaining FJC guards are served, our office will likely represent them as well. As of the writing of this letter, we only have confirmation by our client(s) of service upon these two defendants. However, we are advised by counsel for the plaintiff that the remaining guards have been served as well, which I am certain will be confirmed in short order.

Pursuant to Your Honor's *Communication with Chambers* Rule E, I respectfully make this request for a sixty (60) day extension of time to answer or otherwise respond to the complaint on behalf of FJC and its named guards. This application is made after consultation with counsel for the other parties and with the consent of counsel for the plaintiffs.

The current/earliest date for which an answer is due (at the very least for FJC) is November 29, 2019.

We respectfully make this request to ensure that the named guards are duly served and that representation will be afforded to them. Moreover, the Amended Complaint contains 294 separate allegations of an event which, as indicated above, is alleged to involve multiple employees of FJC. My client requires time to investigate the matter and the specific allegations made in the Amended Complaint in order to properly respond to the pleading.

This is the first request for such an extension. This request does not affect any scheduled court date.

Thank you for your consideration.

Respectfully yours,

David L. Metzger
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cc: all attorneys – via ECF